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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 LAUSTEVEION JOHNSON,

16 Plaintiff,

17 v.

18 DAVID WILLIS, et al.,

19 Defendants.

20 CASE NO. 2:17-cv-01121-APG-EJY

21 **STIPULATION AND ORDER TO**  
**EXTEND TIME FOR PLAINTIFF TO**  
**RESPOND TO DEFENDANTS'**  
**MOTION FOR SUMMARY**  
**JUDGMENT**

22 **(FIRST REQUEST)**

23 Plaintiff Lausteveion Johnson (“*Plaintiff*”), by and through his counsel of record Frank M. Flansburg III, Esq., Emily A. Ellis, Esq., and Maliq I. Kendricks, Esq., of the law firm Brownstein Hyatt Farber Schreck, LLP; and Defendants Rashonda Smith and Douglas Thrasher (“*Defendants*,” and together with Plaintiff, the “*Parties*”), by and through their counsel of record Leo T. Hedges, Esq., Deputy Attorney General, State of Nevada, Office of the Attorney General, hereby stipulate and agree, contingent on this Court’s approval, as follows:

24 1. This stipulation is made pursuant to LR IA 6-1.

25 2. On July 11, 2023, Defendants filed their Motion for Summary Judgment (“*Defendants’ Motion*”). See ECF No. 174.

26 3. Plaintiff’s response to Defendants’ Motion is currently due on August 1, 2023.

1       4. On July 10, 2023, Plaintiff's counsel was informed by Deputy Attorney General  
2 Andrew Nelson that Magistrate Judge Baldwin would like to discuss a global settlement in all of  
3 Plaintiff's cases, including the above captioned case and one other case with undersigned counsel.

4       5. As a result, the Parties agree and respectfully request that the deadline for Plaintiff  
5 to file a response to Defendants' Motion be extended until fourteen (14) days after the conclusion  
6 of any unsuccessful global settlement conference or mediation.

7       6. This is the first request for an extension of this deadline.

8       7. This stipulation is made in good faith and the request is not made in attempt to delay  
9 proceedings.

10      **IT IS SO STIPULATED.**

11      DATED this 19th day of July, 2023.

12      DATED this 19th day of July, 2023.

13      \_\_\_\_\_  
14      /s/ *Maliq I. Kendricks* \_\_\_\_\_  
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24      /s/ *Leo T. Hedges* \_\_\_\_\_  
25      Aaron D. Ford, Esq.  
26      Leo T. Hedges, Esq.  
27      STATE OF NEVADA  
28      Office of the Attorney General  
29      555 E. Washington Ave., Ste. 3900  
30      Las Vegas, NV 89101

31      *Attorneys for Defendants Rashonda Smith and*  
32      *Douglas Thrasher*

33      **IT IS SO ORDERED.**

34      DATED: July 21, 2023

35        
36      \_\_\_\_\_  
37      UNITED STATES DISTRICT JUDGE